

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS C. GOLDSTEIN,

Defendant.

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CRIMINAL NO. LKG-25-6

**DEFENDANT THOMAS C. GOLDSTEIN’S MOTION TO SEAL HIS MOTION TO
INVALIDATE CERTAIN ORDERS SUSPENDING THE STATUTE OF LIMITATIONS**

Defendant Thomas C. Goldstein respectfully requests this Court to order that his Motion to Invalidate Certain Orders Suspending the Statute of Limitations (“Motion”) and related exhibits be placed under seal. Defendant is simultaneously filing a redacted, public version of his Motion and certain exhibits. The sealed information consists of sensitive personal information; bank account and other financial account information; information filed in an *ex parte* application by the government under 18 U.S.C. § 3292; and orders of this Court filed under seal. The remaining material is otherwise available to the public in the redacted version of the Motion.

Accordingly, pursuant to Local Rule 207.2, Defendant respectfully requests the Court to approve of the filing of his Motion and related exhibits under seal.

Respectfully submitted,

/s/ Jonathan I. Kravis

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Dated: March 31, 2025